

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LEWIS S. CLARK and PATRICIA E. CLARK, Individually
and on behalf of all others similarly situated,

Plaintiff,
vs.

BARRICK GOLD CORPORATION, AARON W. REGENT,
JAMIE C. SOKALSKY, and AMMAR AL-JOUNDI,

Defendants.

No. 13-Civ-3851 (RPP)

ECF Case

CLEMENT BERNARD, Individually and on behalf of all
others similarly situated,

Plaintiffs,
v.

BARRICK GOLD CORPORATION, AARON W. REGENT,
JAMIE C. SOKALSKY, and AMMAR AL-JOUNDI,

Defendants.

No. 13-cv-4123 (RPP)

ECF Case

CITY OF BROCKTON RETIREMENT SYSTEM,
Individually and on behalf of all others similarly situated,

Plaintiffs,
vs.

BARRICK GOLD CORPORATION, AARON W. REGENT,
JAMIE C. SOKALSKY, and AMMAR AL-JOUNDI,

Defendants.

No. 13-cv-5437

ECF Case

**NOTICE OF MOTION OF RETAIL WHOLESALE & DEPARTMENT STORE UNION
LOCAL 338 PENSION FUND FOR CONSOLIDATION, APPOINTMENT OF LEAD
PLAINTIFF AND APPROVAL OF LEAD COUNSEL**

PLEASE TAKE NOTICE that upon the accompanying Declaration of Ira M. Press, dated August 5, 2013, the exhibits attached thereto, the accompanying Memorandum of Law and all prior pleadings and proceedings had herein, Class member Retail Wholesale & Department Store Union Local 338 Pension Fund (collectively "Movant" or "RWDSU Local 338") will move this Court, before the Honorable Robert P. Patterson, United States District Judge, in Courtroom 24A, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, on a date and at a time designated by the Court, for an Order: (i) pursuant to Fed R. Civ. P. 42(a)

consolidating the above-captioned actions; (ii) pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”) appointing RWDSU Local 338 as Lead Plaintiff in the above-captioned securities class actions; (iii) for the Court’s approval of selection of the law firm of Kirby McInerney LLP as Lead Counsel for the proposed Class; and (iv) grant such other and further relief as the Court may deem just and proper.

Dated: August 5, 2013

Respectfully Submitted,

KIRBY McINERNEY LLP

By: /s/ Ira M. Press
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*Counsel for Lead Plaintiff Movant Retail
Wholesale & Department Store Union Local
338 Pension Fund and Proposed Lead
Counsel for Class*

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was forwarded to all counsel of record through the Court's ECF system on August 5, 2013.

/s/ Ira M. Press
Ira M. Press